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**Sent:** 9/14/2021 8:52:08 PM  
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**Subject:** RE: HPNS Parcel G Draft Field Change Request - Sr-90 Method Update  
**Attachments:** smime.p7s

Wayne/Nina/Terry,

As a follow-up from our call, to clarify, the FCR is proposing to analyze all previous Sr-90 samples using the new laboratory method procedure. This would involve taking a new aliquot from the original sample material that was retained by the laboratory. The basis for this is for a consistent evaluation of all Sr-90 results using the improved method with reduced uncertainty.

I also wanted to clarify that the included decision criteria is a draft proposal, and we are open to agency feedback on decision criteria or procedures to mitigate potential false positives. The Navy is pursuing to incorporate the field change request as soon as practical, and is requesting feedback by the end of this week. This will allow efficient use of the concurrent review of the Navy QAO.

V/r,  
Paul

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**From:** Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA)  
**Sent:** Tuesday, September 14, 2021 09:50  
**To:** Praskins, Wayne <Praskins.Wayne@epa.gov>; Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>; Han, Terry@CDPH <terry.han@cdph.ca.gov>  
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**Subject:** HPNS Parcel G Draft Field Change Request - Sr-90 Method Update

Wayne/Nina/Terry,

As discussed over the last couple of months, the Navy contractor has drafted a field change request to update the Sr-90 Method. In general, the current laboratory method has a higher uncertainty due to the sample preparation procedure. The higher uncertainty interferes with evaluating very low Sr-90 concentrations associated with the Sr-90 Remedial Goal. The updated method preparation procedure includes a larger aliquot size (2.5 grams) and 14-day ingrowth which should lower measurement uncertainty. The full Standard Operating Procedure (SOP) is attached to the Field Change Request.

In addition, the Field Change Request includes decision criteria for confirming samples results, consistent with Work Plan Section 5.3.2. Confirmation of sample results with elevated activity will include the following:

- Sr-90 results will immediately (to the maximum extent practical) be recounted by the laboratory.
- If the recounted sample is below the RG, then the initial result will be considered a false positive.
- If a recount of the sample is not possible, or the recount sample result exceeds the RG, two (2) additional aliquots will be collected from the sample and analyzed for Sr-90.
- If the results of both of the additional aliquots are below the RG, then the original result will be considered a false positive. If either one of the two additional aliquot results is above the RG, then the sample will be considered an exceedance.

The draft field change request is pending Navy Quality Assurance Officer signature to be finalized.

Please let me know if you have any questions or feedback. We can also discuss this afternoon.

Thanks!

V/r,  
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